

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Mohler Technology, Inc.
2355 Eby Road
Boonville, Indiana 47601**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 173-12265-00025	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary jobber motor shop that manufactures and repairs electric motors.

Authorized Individual: Mohler Technology
Source Address: 2355 Eby Road, Booneville, Indiana 47601
Mailing Address: P.O. Box 669, Booneville, Indiana 47601-0669
Phone Number: (812) 897-2900
SIC Code: 7694 and 3621
County Location: Warrick
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) air atomization spray booth, identified as Process # 3, venting to Stack # 8 and using a dry fiber filter bafflet to collect particulate matter (PM).
- (b) One (1) three foot impregnation dip coating system, identified as Point 10A.
- (c) One (1) ten foot impregnation dip coating system, identified as Point 10B.
- (d) One (1) dip coating tank, identified as Point 9 and venting through Stack # 9.
- (e) One (1) Bayco incinerator, identified as Process # 1, rated at 1.5 MMBtu/hour, using an afterburner to control volatile organic compound (VOC) emissions and venting through Stack # 4.
- (f) One (1) natural gas Babbitt heating unit, identified as Process # 5, comprised of four (4) individual Babbitt heaters with a combined rated capacity of 1.4 MMBtu/hour and exhausting through Stack # 7.
- (g) One (1) natural gas drying oven, identified as Drying Oven # 1, rated at 1.260 MMBtu/hour and venting through Stack #s 1A and 1B.
- (h) One (1) natural gas drying oven, identified as Drying Oven # 2, rated at 0.5 MMBtu/hour and venting through Stack # 2.
- (i) One (1) electric drying oven, identified as Drying Oven # 3, venting through Stack # 3.
- (j) Eight (8) radiant heaters, one (1) space heater, and one (1) water heater with a combined capacity of 2.86 MMBtu/hour.

- (k) Two (2) natural gas Hotsy steam cleaners, identified as Process #4A rated at 0.35 MMBtu/hour each and venting through Stack # 6.
- (l) One (1) pneumatic blasting process, identified as Process # 4B, using Type II Urea and controlling particulate matter (PM) emissions with a cyclone with identification # GM9931US.
- (m) One (1) cold cleaner type degreaser (parts washer) using a manual brushing agitation method, controlling volatile organic compound (VOC) emissions by using a closed lid system.
- (n) One (1) cold cleaner type degreaser (Mart cleaner) spraying with a turntable agitation method, rated at 0.5 MMBtu/hour using natural gas, identified as Process # 4C and venting through Stack #s 5A and 5B.

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Permit Revision [326 IAC 205.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.5 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.6 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;

- (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.14 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS - Surface Coating

Facility Description:

- (a) One (1) air atomization spray booth, identified as Process # 3, venting to Stack # 8 and using a dry fiber filter baffle to collect particulate matter (PM).
- (b) One (1) three foot impregnation dip coating system, identified as Point 10A
- (c) One (1) ten foot impregnation dip coating system, identified as Point 10B.
- (d) One (1) dip coating tank, identified as Point 9 and venting through Stack # 9.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the air atomization spray booth shall be limited by the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOCs)

- (a) Potential to emit of VOC from the impregnation dip coating system, identified as emission units 10A and 10B, are less than 25 tons per year. Therefore, 326 IAC 8-1-6 and 326 IAC 8-2 will not apply. Any change or modification which may increase the potential emissions to 25 tons per year or more of volatile organic compounds must be approved by the Office of Air Quality before any such change may occur.
- (b) This limit includes the evaporation of thinners being added to coatings to adjust viscosity, therefore, it is necessary to keep coating and solvent containers covered at all times to prevent solvent evaporation.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emissions units by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

The dry fiber filter baffle for PM control shall be in operation at all times when the spray booth #3 is in operation.

Compliance Monitoring Requirements {326 IAC 2-5.1-3(e)(2)}[326 IAC 2-6.1-5(a)(2)]

D.1.5 Monitoring

- (a) Semi-annual inspections shall be performed of the coating emissions from stack 8 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Combustion Sources

Facility Description:

- (e) One (1) Bayco incinerator, identified as Process # 1, rated at 1.5 MMBtu/hour, using an afterburner to control volatile organic compound (VOC) emissions and venting through Stack # 4.
- (f) One (1) natural gas Babbitt heating unit, identified as Process # 5, comprised of four (4) individual Babbitt heaters with a combined rated capacity of 1.4 MMBtu/hour and exhausting through Stack # 7.
- (g) One (1) natural gas drying oven, identified as Drying Oven # 1, rated at 1.260 MMBtu/hour and venting through Stack #s 1A and 1B.
- (h) One (1) natural gas drying oven, identified as Drying Oven # 2, rated at 0.5 MMBtu/hour and venting through Stack # 2.
- (i) One (1) electric drying oven, identified as Drying Oven # 3, venting through Stack # 3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Burning Regulations [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the Bayco paint burn-off incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner.
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.
- (h) Not emit particulate matter in excess of:
 - (1) Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or

- (2) All other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.
- (i) Not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM compliance with the PM limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Visible Emissions Notations

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- (a) Visible emission notations of the exhaust from stacks 1A, 1B, 2, 3, 4 and 7 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks 1A, 1B, 2, 3, 4, and 7.

**SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS - Hotsy Steam
Cleaners and Water Heater**

Facility Description:

- (j) One (1) water heater with a combined capacity of 2.86 MMBtu/hour.
- (k) Two (2) Hotsy steam cleaners, identified as Process #4A rated at 0.35 MMBtu/hour each and venting through Stack # 6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no applicable emission limitations or standards that apply to these sources.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS -

Facility Description:

- (I) One (1) pneumatic blasting process, identified as Process # 4B, using Type II Urea and controlling particulate matter (PM) emissions with a cyclone with identification # GM9931US.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the pneumatic shot blasting operation shall not exceed 2.85 pounds per hour when operating at a maximum capacity flow rate of 1,160.81 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone shall be in operation at all times the pneumatic shot blasting operation is in operation, in order to comply with this limit.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.5

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (m) One (1) cold cleaner type degreaser (parts washer) using a manual brushing agitation method, controlling volatile organic compound (VOC) emissions by using a closed lid system.
- (n) One (1) cleaner (Mart cleaner) spraying with a turntable agitation method, rated at 0.5 MMBtu/hour using natural gas, identified as Process # 4C and venting through Stack #s 5A and 5B.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.5.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for the cold cleaner type degreaser (parts washer) labeled as (M) in the facility description, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a emissions unit for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.5.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met for the cold cleaner type degreaser (parts washer) labeled as (M) in the facility description:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
(Include local agency when applicable)**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Mohler Technology, Inc.
Address:	2355 Eby Road
City:	Booneville, Indiana 47601
Phone #:	(812) 897-2900
MSOP #:	173-12265-00025

I hereby certify that Mohler Technology, Inc. is ☒ still in operation.
☐ no longer in operation.

I hereby certify that Mohler Technology, Inc. is ☒ in compliance with the requirements of MSOP 173-12265-00025
☐ not in compliance with the requirements of MSOP 173-12265-00025

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES ? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL * SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions

**applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Minor Source Operating Permit

Source Background and Description

Source Name: Mohler Technology, Inc.
Source Location: 2355 Eby Road, Boonville, Indiana 47601
County: Warrick
SIC Code: 7694 and 3621
Operation Permit No.: 173-12265-00025
Permit Reviewer: ERG/KH

The Office of Air Quality (OAQ) has reviewed an application from Mohler Technology, Inc., relating to the operation of one jobber motor shop that manufactures and repairs electric motors.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) air atomization spray booth, identified as Process # 3, venting to Stack # 8 and using a dry fiber filter bafflet to collect particulate matter (PM).
- (b) One (1) three foot impregnation dip coating system, identified as Point 10A.
- (c) One (1) ten foot impregnation dip coating system, identified as Point 10B.
- (d) One (1) dip coating tank, identified as Point 9 and venting through Stack # 9.
- (e) One (1) Bayco incinerator, identified as Process # 1, rated at 1.5 MMBtu/hour, using an afterburner to control volatile organic compound (VOC) emissions and venting through Stack # 4.
- (f) One (1) natural gas Babbitt heating unit, identified as Process # 5, comprised of four (4) individual Babbitt heaters with a combined rated capacity of 1.4 MMBtu/hour and exhausting through Stack # 7.
- (g) One (1) natural gas drying oven, identified as Drying Oven # 1, rated at 1.260 MMBtu/hour and venting through Stack #s 1A and 1B.
- (h) One (1) natural gas drying oven, identified as Drying Oven # 2, rated at 0.5 MMBtu/hour and venting through Stack # 2.
- (i) One (1) electric drying oven, identified as Drying Oven # 3, venting through Stack # 3.
- (j) Eight (8) radiant heaters, one (1) space heater, and one (1) water heater with a combined capacity of 2.86 MMBtu/hour.
- (k) Two (2) natural gas Hotsy steam cleaners, identified as Process #4A rated at 0.35 MMBtu/hour each and venting through Stack # 6.

- (l) One (1) pneumatic blasting process, identified as Process # 4B, using Type II Urea and controlling particulate matter (PM) emissions with a cyclone with identification # GM9931US.
- (m) One (1) cold cleaner type degreaser (parts washer) using a manual brushing agitation method, controlling volatile organic compound (VOC) emissions by using a closed lid system.
- (n) One (1) cleaner (Mart cleaner) spraying with a turntable agitation method, rated at 0.5 MMBtu/hour using natural gas, identified as Process # 4C and venting through Stack #s 5A and 5B.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 173-3275-00025 issued on March 21, 1995; and
- (b) Amendment 173-5698-00025 issued on May 31, 1996.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1A & 1B	Process 2	35	.83	750-1000 cfm	450
2	Process 2	33	.67	unknown	450
3	Process 2	33	.50	unknown	450
4	Process 1	34	1.25	680 scfm	1300
5A & 5B	Process 4C	44.17	1.00	N/A	N/A
6	Process 4A	25	.83	N/A	N/A
7	Process 5			N/A	Ambient
8	Process 3				
9	Process 2				

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 12, 2000 with additional information received on June 1, 2000; July 6, 2000; July 31, 2000; and August 3, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	53
PM-10	53
SO ₂	0.02
VOC	37
CO	3.2
NO _x	3.8

HAP's	Potential To Emit (tons/year)
Xylene	6.80
Toluene	0.05
Elthybenzene	0.05
Tetrachloroethylene	0.05
MEK	1.60
Total Other HAPs	<1
TOTAL	8.6

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Warrick County.

Pollutant	Status
PM-10	Attainment
SO ₂	Unclassifiable
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Warrick County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Warrick County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	53
PM ₁₀	53
SO ₂	0.02
VOC	37
CO	3.2
NO _x	3.8

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the emission calculations in Appendix A of this Technical Support Document.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit MSOP 173-12265-00025, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Subpart 63) applicable to this source. 40 CFR Subpart 63 does not apply to the degreaser because it does not use any solvent containing methylene

chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Warrick County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the pneumatic sand blasting operation shall not exceed 2.85 pounds per hour when operating at a maximum capacity flow rate of 1,160.81 pounds per hour. The allowable PM emission rate from the air atomized spray both shall be limited by the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 4-2 (Burning Regulations for Incinerators)

Pursuant to 326 IAC 4-2-2, the Bayco paint burn-off incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner.
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.

- (h) Not emit particulate matter in excess of:
 - (1) Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or
 - (2) All other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.
- (i) Not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

326 IAC 8-3-2 (Cold Cleaner Operations)

For the cold cleaner type degreaser (parts washer) labeled as (M) in the Permittee Emission Units and Pollution Control Equipment Section, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with an emissions unit for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaner type degreaser (parts washer) labeled as (M) in the Permitted Emission Units and Pollution Control Equipment Section, is subject to the requirements of 326 IAC 8-3-5(a). This rule requires that the owner or operator of a cold cleaner degreaser facility shall ensure that the degreaser is equipped with a cover that must be designed so that it can be easily operated with one (1) hand if certain conditions exist. The degreaser must be equipped with a facility for draining cleaned articles.

326 IAC 8-1-6 (New Facilities), 326 IAC 8-2 (Surface Coating Rules), and 326 IAC 8-6 (Organic Solvents)

The dip tank and air atomization processes are not subject to 326 IAC 8-1-6 and 326 IAC 8-2 because the construction commenced prior to January 1, 1980. In addition, these processes are not subject to 326 IAC 8-6 because the potential VOC emissions are less than 100 tons per year.

The vacuum impregnation systems (installed in 1984) commenced construction after November 1, 1980, but prior to July 1, 1990. Therefore, this coating process is not subject to 326 IAC 8-1-6 and 326 IAC 8-2 (surface coating rules) because the potential VOC emissions from these facilities are less than 25 tons per year.

Conclusion

The operation of this jobber motor shop that manufactures and repairs electric motors shall be subject to the conditions of the attached proposed Minor Source Operating Permit 173-12265-00025.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit

Source Name: Mohler Technology, Inc.
 Source Location: 2355 Eby Road, Boonville, Indiana 47601
 County: Warrick
 SIC Code: 7694, 3621
 Operation Permit No.: M173-12265-00025
 Permit Reviewer: ERG/KH

On December 29, 2000, the Office of Air Quality (OAQ) had a notice published in the Boonville Standard, Boonville, Indiana, stating that Mohler Technology had applied for a Minor Source Operating Permit to operate a stationary jobber shop that manufacturers and repairs electric motors. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

Section D

1. OAQ has decided to add a monitoring condition to the permit requiring semi-annual overspray inspections of the roof for the spray booth for the following reason. Based on the nature of these operations and the fact that the source is located close to a residential district, it is important for the source to monitor the overspray from the paint booth to ensure that they are operating under normal conditions. Semi-annual inspections will ensure that the paint booth and its controls are operating correctly, therefore, minimizing any impact to the nearby communities. Changes to the permit as a result of this comment are as follows:

Compliance Monitoring Requirements {326 IAC 2-5.1-3(e)(2)}[326 IAC 2-6.1-5(a)(2)]

D.1.5 Monitoring

- (a) **Semi-annual inspections shall be performed of the coating emissions from stack 8 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
2. OAQ has decided to add a monitoring condition to the permit requiring visible emissions notations of

the stacks associated with the Bayco incinerator, the Babbit heating unit and the drying ovens for the following reason. As stated in comment #1, based on the nature of these operations and the fact that the source is located close to a residential district, it is important for the source to monitor their visible emissions to ensure that they are operating under normal conditions. In the event that a malfunction occurs, or some other event that could lead to abnormal PM emissions, the source will be able to recognize a problem exists much quicker if they are required to inspect visible emissions once per shift than if they were not required to monitor at all. This will minimize any impact to the nearby communities. In addition, the source will be required to keep records of the results of the once per shift visible emissions notations. Changes to the permit as a result of this comment are as follows:

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Visible Emissions Notations

- (a) **Visible emission notations of the exhaust from stacks 1A, 1B, 2, 3, 4 and 7 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.**

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Record Keeping Requirements

- (a) **To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks 1A, 1B, 2, 3, 4, and 7.**

Entire Permit

3. The IDEM Office of Air Management has changed it's name to the Office of Air Quality. This change was made throughout the permit.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****All Natural Gas Combustion Units*****Company Name: Mohler Technology, Inc.****Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669****MSOP: 173-12265-00025****Pit ID: 00025****Reviewer: ERG/TK****Date: 07/26/2000**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

8.72

76.39

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.29	0.29	0.02	3.82	0.21	3.21

*Natural gas combustion units at Mohler Technology, Inc. include: one Babbitt cleaning unit (comprised of four individual Babbitt heaters) rated at 1.4 MMBtu/hr; two drying ovens, Drying Oven # 1 and # 2, rated at 1.26 MMBtu/hr and 0.5 MMBtu/hr, respectively; one water heater, eight radiant heaters, and one space heater with a combined capacity of 2.86 MMBtu/hr; one Mart cleaner rated at 0.5 MMBtu/hr; two steam cleaners rated at 0.35 MMBtu/hr each; and one Bayco incinerator rated at 1.5 MMBtu/hr.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****All Natural Gas Combustion Units*****Company Name: Mohler Technology, Inc.****Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669****MSOP: 173-12265-00025****Pit ID: 00025****Reviewer: ERG/TK****Date: 07/26/2000****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.021E-05	4.583E-05	2.865E-03	6.875E-02	1.299E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.910E-05	4.201E-05	5.347E-05	1.451E-05	8.021E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

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Abrasive Blasting - Confined

Pneumatic Blasting Process

Company Name: Mohler Technology, Inc.
 Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669
 MSOP: 173-12265-00025
 Pit ID: 00025
 Reviewer: ERG/TK
 Date: 07/26/2000

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Type II Urea	34

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

2880
34
99
0.8125
0.75

Flow Rate (FR) (lb/hr) = 1160.808 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.010
1160.808
0
1

Uncontrolled PM Emissions =	11.61 lb/hr
	50.84 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

updated 1/99
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Appendix A: Emissions Calculations

VOC and Particulate

Dip Coating Processes (9, 10A, & 10B)*

Company Name: Mohler Technology, Inc.

Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669

MSOP: 173-12265-00025

Pit ID: 00025

Reviewer: ERG/TK

Date: *****

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
Point 9 - Blend	8.7	58.90%	0.0%	58.9%	0.0%	48.90%	0.20	1.04	5.14	5.14	1.07	25.64	4.68	0.00E+00	100%
Point 10A - Epoxolite 478	10.0	0.00%	0.0%	0.0%	0.0%	0.00%	0.08	1.03	0.00	0.00	0.00	0.00	0.00	0.00E+00	100%
Point 10B - Epoxolite 477	9.8	0.00%	0.0%	0.0%	0.0%	0.00%	3.42	1.03	0.00	0.00	0.00	0.00	0.00	0.00E+00	100%

Potential Emissions **Add worst case coating to all solvents** **1.07** **25.64** **4.68** **0.00**

*Process includes one Dip Coating Tank (point 9), one 3' Vacuum Impregnation Tank (point 10A), and one 10' Vacuum Impregnation Tank (point 10B).

**Blend includes PED 6440 Polyester Inhibitor, PED 60-60-VT Polyester Resin, and 2839 Vinyl Toluene.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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Appendix A: Emissions Calculations
VOC and Particulate
Spray Booth Surface Coating Operations
Company Name: Mohler Technology, Inc.
Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669
MSOP: 173-12265-00025
Pit ID: 00025
Reviewer: ERG/TK
Date: 07/26/2000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Coating 991308	8.70	85.00%	0.00%	85.00%	0.00%	21.94%	0.25	1.12	7.40	7.40	2.07	49.69	9.07	1.20	33.71	25%
Coating 993919	7.48	74.80%	0.00%	74.80%	0.00%	14.05%	0.25	1.12	5.60	5.60	1.57	37.60	6.86	1.73	39.82	25%

State Potential Emissions from Worst Case Coating **2.07** **49.69** **9.07** **1.73**

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations
Spray Booth HAP Emissions
Company Name: Mohler Technology, Inc.
Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669
MSOP: 173-12265-00025
Pit ID: 00025
Permit Reviewer: ERG/TK
Date: 07/26/2000

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Material	Density (lb/gal)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Weight % Xylene	Weight % MEK	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)
Coating 991308	8.70	0.25	1.12	35.00%	15.00%	3.73	1.60
Coating 993919	7.48	0.25	1.12	73.00%	0.00%	6.70	0.00

Total State Potential Emissions for Worst Case Coating
6.70 **1.60**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum Unit/hr * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Hapcalc.wk4 9/95

Appendix A: Emissions Calculations

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VOC and Particulate

Degreasing Operations

Company Name: Mohler Technology, Inc.
Address City IN Zip: 2355 Eby Road, Boonville, Indiana 47601-0669
MSOP: 173-12265-00025
Plt ID: 00025
Reviewer: ERG/TK
Date: 09/14/2000

Material*	Usage (lb/day)	Usage (tons/yr)	Volatile Component (%)	Potential VOC tons per year
C+H Spray DET RS	1476.00	269.37	5%	13.47
C+H Defoamer	6.48	1.18	0%	0.00
Safety Kleen 105 Parts Washing Solvent	53.76	9.81	100%	9.81

*Worst case is not applied to these since C+H Solvents are both used in the Mart process and Safety Kleen is used in separate process.

State Potential Emissions

23.28

METHODOLOGY

Usage (tons/yr) = Usage (lb/day) * 365 day/year * 1 ton/2000 Lb

Potential VOC tons per year = Usage (tons/yr) * Volatile Component (%)

Total = Sum of all solvent emissions

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Appendix A: Emission Calculations

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HAP Emission Calculations**Degreasing HAP Emissions****Company Name:** Mohler Technology, Inc.**Address City IN Zip:** 2355 Eby Road, Boonville, Indiana 47601-0669**MSOP#:** 173-12265-00025**Pit ID:** 00025**Permit Reviewer:** ERG/TK**Date:** 09/14/2000

Material	Usage (lb/day)	Usage (tons/yr)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Tetrachloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Tetrachloroethylene Emissions (ton/yr)
Safety Kleen 105 Parts Washing Solvent	53.76	9.81	1.00%	0.50%	0.50%	0.50%	0.10	0.05	0.05	0.05

Total State Potential Emissions**0.10****0.05****0.05****0.05****METHODOLOGY**

Usage (ton/yr) = Usage (lb/day) * 24day/yr * 1 ton/2000lb

HAPS emission rate (tons/yr) = Usage (ton/yr) * Weight % HAP

Hapcalc.wk4 9/95

Appendix A: Emission Calculations

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HAP Emission Calculations**Degreasing HAP Emissions****Company Name:** Mohler Technology, Inc.**Address City IN Zip:** 2355 Eby Road, Boonville, Indiana 47601-0669**MSOP#:** 173-12265-00025**Pit ID:** 00025**Permit Reviewer:** ERG/TK**Date:** 09/14/2000

Material	Usage (lb/day)	Usage (tons/yr)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Tetrachloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Tetrachloroethylene Emissions (ton/yr)
Safety Kleen 105 Parts Washing Solvent	53.76	9.81	1.00%	0.50%	0.50%	0.50%	0.10	0.05	0.05	0.05

Total State Potential Emissions**0.10****0.05****0.05****0.05****METHODOLOGY**

Usage (ton/yr) = Usage (lb/day) * 24day/yr * 1 ton/2000lb

HAPS emission rate (tons/yr) = Usage (ton/yr) * Weight % HAP

Hapcalc.wk4 9/95

Emissions Summary

Total Criteria Emissions (tons/year)

PM = PM10	SO2	NOx	CO	VOC
52.86	0.02	3.82	3.21	37.24

Total HAP Emissions (tons/year)

Organic HAPs

Benzene	Dichlorobenzene	Formaldehyde	Hexane	Xylene	Toluene	Ethylbenzene	Tetrachloroethylene	MEK
8.021E-05	4.583E-05	2.865E-03	6.875E-02	6.80	0.05	0.05	0.05	1.60

Metallic HAPs

Lead	Cadmium	Chromium	Manganese	Nickel
1.910E-05	4.201E-05	5.347E-05	1.451E-05	8.021E-05

Total HAP
8.6221